

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

Leslie Scott, Tal Becker, individually and on behalf of others similarly situated,  
Plaintiff(s),

v.

Case No. 3:21-cv-00401

RVshare, LLC,  
Defendant(s).

**BUSINESS ENTITY DISCLOSURE**  
**(Disclosure of corporate affiliations, business entity citizenship, and financial interests)**

Pursuant to Fed. R. Civ. P. 7.1 and L.R. 7.02, RVshare, LLC makes the following disclosures:

**INSTRUCTIONS: Check the applicable box or boxes, and fully provide any required information. Attach separate pages as necessary to fully provide required information.**

☐ This party is an individual, who resides in \_\_\_\_\_.

☐ This party is a publicly held corporation or other publicly held entity, incorporated in \_\_\_\_\_ and with a principal place of business in \_\_\_\_\_.

☐ This party is a privately held corporation, incorporated in \_\_\_\_\_ and with a principal place of business in \_\_\_\_\_.

☐ This party has parent corporations

If yes, identify **on attached page(s)** all parent corporations, including grandparent and great- grandparent corporations.

☐ Ten percent or more of the stock of this party is owned by a publicly held corporation or other publicly held entity.

If yes, identify **on attached page(s)** all such owners.

☒ This party is a limited liability company or limited liability partnership.

If yes, identify **on attached page(s)** each member of the entity and the member's state of citizenship. If any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well. *See Delay v. Rosenthal Collins, Grp., LLC*, 585 F.3d 1003 (6th Cir. 2009).

☐ This party is an unincorporated association or entity.

If yes, identify **on attached page(s)** the nature of the entity, the members of the entity and the member's state of citizenship. If any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well.

☐ This party is trust.

If yes, identify **on attached page(s)** each trustee and each trustee's state of citizenship. If any trustee is other than an individual person, the required information identifying ownership of the non-individual the trustee and state of citizenship of each sub-trustee must be provided as well.

☐ Another publicly held corporation or another publicly held entity has a direct financial interest in the outcome of the litigation.

If yes, identify **on attached page(s)** all corporations or entities and the nature of their interest.

**Any additional pertinent information should also be provided on attached page(s).**

Date: 7/12/21

Signature: /s/ Michael G. Abelow

Printed Name: Michael G. Abelow

Title: Attorney for RVShare, LLC

**CERTIFICATE OF SERVICE**

**[Include certificate of service pursuant to LR 5.01.  
Attach as separate page if necessary due to space constraints.]**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**LESLIE SCOTT, TAL BECKER,  
individually and on behalf of others  
similarly situated,**

**Plaintiffs,**

**v.**

**RVSHARE LLC**

**Defendant.**

**Case No. 3:21-cv-00401**

**Judge William L. Campbell, Jr.**

**Magistrate Judge Alistar Newbern**

**DEFENDANT RVSHARE LLC's ADDENDUM TO  
BUSINESS ENTITY DISCLOSURE FORM**

Defendant RVshare LLC ("RVshare") provides the following additional information pursuant to Fed. R. Civ. P. 7.1, L.R. 7.02, and the Court's Business Entity Disclosure form:

As disclosed, RVshare is a limited liability company. The Business Entity Disclosure form requires an LLC to disclose "each member of the entity and the member's state of citizenship" and "[i]f any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well," citing to *Delay v. Rosenthal Collins, Grp., LLC*, 585 F.3d 1003 (6th Cir. 2009). As the Sixth Circuit explained in *Delay*, "[w]hen diversity jurisdiction is invoked in a case in which a limited liability company is a party, the court needs to know the citizenship of each member of the company. And because a member of a limited liability company may itself have multiple members—and thus may itself have multiple citizenships—the federal court needs to know the citizenship of each 'sub-member' as well."

RVshare respectfully requests to be relieved of this requirement because such citizenship information is not needed to determine that jurisdiction exists in this case because Plaintiffs have filed a putative class-action complaint and jurisdiction is asserted under CAFA. (Compl. ¶ 4.)

For purposes of CAFA jurisdiction, “an unincorporated association shall be deemed to be a citizen of the State where it has its principal place of business and the State under whose laws it is organized.” 28 U.S.C. § 1332(d)(10). Accordingly, *Delay’s* concerns regarding non-CAFA diversity jurisdiction are not implicated. *E.g., Eagles Nest, LLC v. Moy Toy, LLC*, No. 2:14-cv-00010, 2014 WL 4655277, at \*5 (M.D. Tenn. Sept. 16, 2014) (“CAFA itself evinces an intent that suits by unincorporated associations be treated like suits by corporations in that the citizenship of the association for diversity purposes is determined by the entity’s principal place of business and not by the citizenship of its members.”).

RVshare is organized in Delaware and its principal place of business is in Ohio. Accordingly, for purposes of CAFA jurisdiction, it is a citizen of Delaware and Ohio.

By way of further disclosure, RVshare is ultimately held by approximately 46 known natural person members and 8 entity members. Those entity members are KKR Rocket Aggregator L.P. (affiliated with Kohl Kravis Roberts & Co.); Tritium I, LP, Trit RVS CP, LP, and Tritium I-B, LP (each affiliated with Tritium Partners, LLC); StepStone Tactical Growth Fund II, L.P.; StepStone Tactical Growth Fund II Offshore Holdings, L.P.; and MWJ International, Inc. At the time of this disclosure, RVshare and counsel are unable to ascertain the partners of these entities.

Respectfully submitted,

/s/ Michael G. Abelow

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of July, 2021, a true and exact copy of the foregoing was electronically filed with the Clerk's office using the CM/ECF system, which sent a notification to all parties registered with the Court's electronic filing system, including the following:

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